

Hearing Date and Time: November 30, 2021, at 11:00 a.m. (Prevailing Eastern Time)

Richard J. Cooper
Lisa M. Schweitzer
Luke A. Barefoot
Thomas S. Kessler
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

*Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.¹

Chapter 11

Case No.: 20-11254

Jointly Administered

**AGENDA OF MATTERS SCHEDULED FOR
HEARING ON NOVEMBER 30, 2021 AT 11:00 A.M.**

Time and Date of Hearing: November 30, 2021 at 11:00 a.m. (Prevailing

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM-Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services LLC (30-1133972); Maintenance Service Experts LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services, Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); LATAM Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); ABSA Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corretora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

Eastern Time)

Location of Hearing:

The Honorable Judge Garrity, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004. In light of COVID-19, the hearing will only be conducted telephonically. Parties wishing to participate in must make arrangements through CourtSolutions LLC (www.court-solutions.com). The filing and service deadline of any objections or responses to entry of a final order is listed below for each motion and application.

Copies of Motions:

Copies of the pleadings can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) from the Debtors' notice and claims agent, Prime Clerk LLC, located at One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, New York 10165, at <https://cases.primeclerk.com/LATAM> or by calling +1 212 257 5450. Note that a PACER password is needed to access documents on the Court's website.

I. In re LATAM Airlines Group S.A. (20-11254)

A. STATUS CONFERENCE

1. Case Conference

B. UNCONTESTED MATTERS

2. Omnibus Amended, Satisfied, No Liability, Modified, and Duplicate Claims Motion (Non-Substantive). *Debtors' Thirty-Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Satisfied, No Liability, Modified, and Duplicate).* ECF No. 3400.

- i. **Response Deadline:** November 22, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
 1. *Notice of Withdrawal of the Filing of Debtors' Thirty-Seventh Omnibus Objection (Amended, Satisfied, No Liability, Modified and Duplicate) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 1721.* ECF No. 3458.
 2. *Notice of Withdrawal of Objection Solely with Respect to Claim*

No. 2294 Included in the Debtors' Thirty-Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Satisfied, No Liability, Modified, and Duplicate). ECF No. 3465.

3. *Notice of Withdrawal of Objection Solely With Respect to Claim No. 3988 Included in the Debtors' Thirty-Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Satisfied, No Liability, Modified, and Duplicate).* ECF No. 3480.

4. *Notice of Adjournment of Debtors' Thirty-Seventh Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 (Amended, Satisfied, No Liability, Modified and Duplicate) Solely with Respect to Claim Nos. 1139, 1155, and 1675 filed by McCann Erickson.* ECF No. 3653.

iv. **Status:** This matter is proceeding on an uncontested basis except with respect to Claim Nos. 1721, 2294, and 3988, for which the objections have been withdrawn, and with respect to Claim Nos. 1139, 1155, and 1675, which have been adjourned to the December 29, 2021 omnibus hearing.

3. **No Liability Claims Motion (Claim No. 4947).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 4947 by Cleubis Alves dos Reis.* ECF No. 3402.

i. **Response Deadline:** November 22, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:** None.

iv. **Status:** This matter is proceeding on an uncontested basis.

4. **No Liability Claims Motion (Claim No. 5818).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 5818 by Luciano Otavio Cardim Alvares.* ECF No. 3404.

i. **Response Deadline:** November 22, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:** None.

iv. **Status:** This matter is proceeding on an uncontested basis.

5. **No Liability Claims Motion (Claim No. 5887).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 5887 by Hocelia Oliveira do Bonfim Quintino.* ECF No. 3405.
 - i. **Response Deadline:** November 22, 2021 at 4:00 P.M.
 - ii. **Responses Received:** None.
 - iii. **Related Documents:** None.
 - iv. **Status:** This matter is proceeding on an uncontested basis.
6. **No Liability Claims Motion (Claim No. 6012).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 6012 by Isaulino Mauricio Quintino.* ECF No. 3406.
 - i. **Response Deadline:** November 22, 2021 at 4:00 P.M.
 - ii. **Responses Received:** None.
 - iii. **Related Documents:** None.
 - iv. **Status:** This matter is proceeding on an uncontested basis.
7. **No Liability Claims Motion (Claim No. 6013).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 6013 by Josue do Bonfim Quintino.* ECF No. 3407.
 - i. **Response Deadline:** November 22, 2021 at 4:00 P.M.
 - ii. **Responses Received:** None.
 - iii. **Related Documents:** None.
 - iv. **Status:** This matter is proceeding on an uncontested basis.
8. **No Liability Claims Motion (Claim No. 6075).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) to Claim Number 6075 by Valdean Carlos Pinheiro do Nascimento.* ECF No. 3409.
 - i. **Response Deadline:** November 22, 2021 at 4:00 P.M.
 - ii. **Responses Received:** None.
 - iii. **Related Documents:** None.
 - iv. **Status:** This matter is proceeding on an uncontested basis.
9. **Regional One and Dash Claims Settlement Motion.** *Debtors' Motion for Entry*

of an Order Pursuant to Sections 105(a) and 363 of the Bankruptcy Code and Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving a Settlement of Claim Nos. 1996 & 1997. ECF No. 3502.

- i. **Response Deadline:** November 23, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

10. ELFC Lease Amendment Agreement and Settlement Motion. *Debtors' Motion for Entry of an Order Approving Engine Lease Amendment Agreements and Settlement Stipulation by and Among the Debtors and Engine Lease Finance Corporation (CFM56-5B3/3 Engines). ECF No. 3513.*

- i. **Response Deadline:** November 23, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

C. ADJOURNED MATTERS

1. Rule 2004 Motion. *Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1171.*

- i. **Response Deadline:** October 13, 2020 at 4:00 P.M.
- ii. **Responses Received:**
 - 1. *Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1186.*
 - 2. *Joinder of Aircraft Counterparties to Objection of The Official Committee Of Unsecured Creditors To The Debtors' Motion For Entry of Order Establishing Procedures for The Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant To Bankruptcy Rule 2004. ECF No. 1188.*

3. *Joinder of BNP Paribas and Certain Export Credit Agencies to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1189.
4. *Joinder of Contract Counterparties to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1190.
5. *Joinder of Aircraft Counterparty to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1191.
6. *Joinder of Aircraft Counterparty to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1192.
7. *Joinder to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1194.
8. *Joinder to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1195.
9. *Joinder of Avolon Aerospace to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to*

Bankruptcy Rule 2004. ECF No. 1201.

10. *Joinder of Crédit Agricole Corporate and Investment Bank, as Agent Under the Spare Engine Facility, to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1202.*
11. *Joinder of Natixis, as Agent Under the Yeco and Jacana Facilities, to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1203.*

iii. **Related Documents:**

1. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1332.*
2. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1478.*
3. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1631.*
4. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1864.*
5. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy*

Rule 2004. ECF No. 2062.

6. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2219.*
7. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2348.*
8. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2562.*
9. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2757.*
10. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2943.*
11. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 3385.*
12. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 3657.*

- iv. **Status:** This matter is adjourned to the December 29, 2021 omnibus hearing.

2. Omnibus CAXDAC Claims Objection Motion (Substantive). Debtors'

Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims filed by CAXDAC Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 [Solely with respect to Claim Nos. 2573 and 3126] . ECF No. 2733.

i. **Response Deadline:** August 16, 2021 at 4:00 P.M.

ii. **Responses Received:**

1. *Opposition of CAXDAC to the Debtors' Twenty-Eight Objection (Substantive) to Certain Claims Filed by CAXDAC. ECF No. 2942.*
2. *Debtors' Reply to CAXDAC's Opposition to the Debtors' Twenty-Eighth Objection (Substantive) to Certain Claims filed by CAXDAC. ECF No. 3001.*

iii. **Related Documents:**

1. *Order Establishing Procedures for Remote Evidentiary Hearing on 9/23/2021 in connection with the Debtors' Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims filed by CAXDAC Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007. ECF No. 3148.*
2. *Notice of Presentment of Stipulation by and Between the Debtors and CAXDAC Regarding the Debtors' Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims Filed by CAXDAC Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007. ECF No. 3153.*
3. *Notice of Cancellation of Remote Evidentiary Hearing on September 23, 2021 in Connection with the Debtors' Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims Filed by CAXDAC Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007. ECF No. 3189.*
4. *Stipulation By and Between the Debtors and CAXDAC Regarding the Debtors' Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims Filed by CAXDAC Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007. ECF No. 3206.*

iv. **Status:** This matter is adjourned *sine die* solely with respect to Claim Nos. 2573 and 3126.

3. Omnibus Union Claims Objection Motion (Substantive). *Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 (No Liability).*

[Solely with respect to Claims No. 1242, 1243, and 2266]. ECF No. 2756.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:**
 1. *Contestacion a la Impugnacion General y Acompaña Documentos.* ECF No. 2971.
 2. Informal Undocketed Response from Sindicato de Trabajadores de Lan Chile S.A.
 3. *Opposition to Debtors' Objection to Prepetition Claim of Sindicato de Pilotos de LATAM.* ECF No. 3127.
- iii. **Related Documents:**
 1. *Notice of Adjournment of Hearing on Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims filed by Certain Unions Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) Solely with Respect to Claim Nos. 1242, 1243, and 2266.* ECF No. 2972.
 2. *Order Granting Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 Solely with respect to Claim No. 2346.* ECF No. 3040.
 3. *Declaration of Nicholas Paul Bordes Tombrou.* ECF No. 3142.
 4. *Notice of Adjournment of Hearing on Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 (No Liability) Solely With Respect to Claim Nos. 1242, 1243 & 2266.* ECF No. 3193.
 5. *Notice of Certified Translations.* ECF No. 3207.
 6. *Notice of Presentment of Stipulation By and Between the Debtors and Sindicato de Empresa de Pilotos LATAM Airlines Regarding the Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2266.* ECF No. 3343.
 7. *Stipulation By and Between the Debtors and Sindicato de Empresa de Pilotos LATAM Airlines Regarding the Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain*

Claims Filed by Unions to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2266. ECF No. 3401.

8. *Statement filed by Sindicato Nacional de Tripulantes de Cabina.* ECF No. 3410.
9. *Third Notice of Adjournment of Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to U.S.C. 502(B)(1) and Fed. R. Bankr. P. 3007 (No Liability) Solely with Respect to Claim Nos. 1242 & 1243.* ECF No. 3431.
10. *Fourth Notice of Adjournment of Hearing on Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 (No Liability) Solely With Respect to Claim No. 1243.* ECF No. 3656.

- iv. **Status:** The objection with respect to Claim Nos. 2266, 1242 and 1243 was adjourned *sine die*.

4. Omnibus Claims Objection Motion (Non-Substantive). *Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied and Modified) [solely with respect to Claim No. 2124].* ECF No. 2960.

- i. **Response Deadline:** September 16, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**

1. *Notice of Adjournment of Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied, and Modified) Solely with Respect to Claim No. 2124 filed by Accenture S.R.L.* ECF No. 3188.
2. *Notice of Adjournment of Hearing on Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely With Respect to Claim No. 266 Filed by Burrana, Inc.* ECF No. 3190.
3. *Second Notice of Adjournment of Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11*

U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied, and Modified) Solely with Respect to Claim No. 2124 filed by Accenture S.R.L. ECF No. 3390.

4. *Notice of Adjournment of Hearing of Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely With Respect to Claim No. 266 Filed by Burrana, Inc. ECF No. 3393.*
5. *Stipulation and Order signed on 11/8/2021 By and Between the Debtors and Burrana Inc. ECF No. 3583.*
6. *Third Notice of Adjournment of Debtors' Thirty-First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied and Modified) Solely with Respect to Claim No. 2124 filed by Accenture S.R.L. ECF No. 3652.*

iv. **Status:** Claim No. 2124 has been adjourned to the December 29, 2021 omnibus hearing.

5. **Omnibus Amended, Duplicate, Satisfied and Modified Claims Motion (Non-Substantive).** *Debtors' Thirty-Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, Satisfied and Modified) [solely with respect to Claim No. 2036]. ECF No. 3214.*

i. **Response Deadline:** October 21, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Withdrawal of the Filing of Debtors' Thirty-Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, Satisfied and Modified) Solely with Respect to Claim 4633. ECF No. 3228.*
2. *Notice of Withdrawal of the Filing of Debtors' Thirty-Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, Satisfied and Modified) Solely with Respect to Claims 706, 1377, 1540, 1552, 2243 and 2830. ECF No. 3372.*

3. *Notice of Withdrawal of the Filing of Debtors' Thirty-Fifth Omnibus Objection (Amended, Duplicate, No Liability, Satisfied and Modified) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely With Respect to Claim 1766.* ECF No. 3373.
4. *Notice of Adjournment of Debtors' Thirty-Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Â§ 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, Satisfied and Modified) Solely With Respect to Claim No. 2036 Filed by Accenture Chile Asesorias y Servicios Ltda.* ECF No. 3391.
5. *Second Notice of Adjournment of Debtors' Thirty-Fifth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, Satisfied and Modified) Solely with Respect to Claim No. 2036 filed by Accenture Chile Asesorias Y Servicios LTDA.* ECF No. 3651.

iv. **Status:** Claim No. 2036 has been adjourned to the December 29, 2021 omnibus hearing.

6. **Motion to Assume Triton, Centaurus and Jolco (Non-Substantive).** *Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3179.

- i. **General Response Deadline:** October 8, 2021 at 4:00 P.M.
- ii. **Response Deadline for the lessor counterparties with respect to the agreements subject to the Assumption Motion:** October 12, 2021 at 4:00 P.M.
- iii. **Responses Received:**
 1. *Response of The Santander Lessors Objecting to Debtors' Motion for Entry of an Order Authorizing the Debtors' to Assume Various Aircraft Agreements and for Related Relief.* ECF No. 3353.
 2. *Response of the SBI Lessors Objecting to Debtors' Motion for Entry of an Order Authorizing the Debtors' to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3354.

iv. **Related Documents:**

1. *Notice of Proposed Cure Costs in Connection with Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3180.
2. *Notice of Adjournment of Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3435.
3. *Second Notice of Adjournment of Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3478.
4. *Third Notice of Adjournment of Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3507.
5. *Fourth Notice of Adjournment of Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3618.
6. *Fifth Notice of Adjournment of Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Various Aircraft Agreements and for Related Relief (Triton, Centaurus and Jolco) (MSNs 4000, 4163, 4171, 4662, 4734, 4756, 4773, 5654, 5666, 5686, 5707, 5748, 5764, 5845 & 5883).* ECF No. 3663.

- v. **Status:** The Debtors' reply is due at 12pm on December 23, and this matter has been adjourned to December 29, 2021.

7. **Guada Motion for Relief from Stay.** *Motion for Relief from Stay.* ECF No. 3558.

- i. **General Response Deadline:** December 22, 2021 at 4:00 P.M.
- ii. **Responses Received:**

iii. **Related Documents:**

1. Notice of Adjournment of Hearing. ECF No. 3627.
2. Motion for Relief from Stay Affirmation in Support of Motion for Relief from Stay. ECF No. 3559.

iv. **Status:** This matter has been adjourned to the December 29, 2021 omnibus hearing.

II. TM Solutions USA LLC v. LATAM Airlines Group S.A. (20-01207)

A. ADJOURNED MATTERS

1. **Motion to Amend.** *Plaintiff's Motion for Leave to File First Amended and Supplemental Class Action Complaint.* ECF No. 17.

i. **Response Deadline:** October 21, 2021.

ii. **Responses Received:**

1. *Defendant LATAM Airlines Group S.A.'s Opposition to Plaintiff's Motion for Leave to File First Amended and Supplemental Class Action Complaint.* ECF No. 20.
2. *Plaintiff's Reply in Support of Motion for Leave to File First Amended and Supplemental Class Action Complaint.* ECF No. 22.

iii. **Related Documents:**

1. *Notice of Adjournment of Hearing on Plaintiff's Motion for Leave to File First Amended and Supplemental Class Action Complaint.* ECF No. 19.
2. *Second Notice of Adjournment of Hearing on Plaintiff's Motion for Leave to File First Amended and Supplemental Class Action Complaint.* ECF No. 24.

iv. **Status:** This matter is adjourned to the January 27, 2022 omnibus hearing.

Dated: November 29, 2021
New York, New York

/s/ Luke A. Barefoot
Richard J. Cooper
Lisa M. Schweitzer
Luke A. Barefoot
Thomas S. Kessler
CLEARY GOTTlieb STEEN &
HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

*Counsel to the Debtors and
Debtors-in-Possession*